

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

---

**INEOS FLUOR AMERICAS LLC,**

*Plaintiff,*

**v.**

**HONEYWELL INTERNATIONAL INC.,**

*Defendant.*

---

**C.A. No. 06-189 (SLR)**

**PLAINTIFF'S NOTICE OF DEPOSITIONS**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, plaintiff INEOS Fluor Americas LLC shall take the depositions upon oral examination of defendant Honeywell International Inc. by and through its following employees on the following dates and times:

Matthew Capeci	Marketing Manager, Industrial Products Honeywell International Inc. 101 Columbia Rd., Morristown, NJ 07962	Feb. 15, 2007	9:00 a.m.
James W. Bova	Global Sales Leader, Industrial Products Honeywell International Inc. 101 Columbia Rd., Morristown, NJ 07962	Mar. 1, 2007	9:00 a.m.
Blake Wiseman	Representative, Residential Distribution Environment Combustion Control Honeywell International Inc. 605 N. Davis Avenue, Unit 3, Richmond, VA 23220	Mar. 5, 2007	9:00 a.m.
Elizabeth Stairs	Assistant General Counsel, Automation and Control Solutions Honeywell International Inc. 2500 W. Union Hills Dr., Phoenix, AZ 85027	Mar. 7, 2007	9:00 a.m.

Don Taylor	Material Management Leader, Specialty Materials Purchasing Honeywell International Inc. 101 Columbia Rd., Morristown, NJ 07962	Mar. 14, 2007	9:00 a.m.
Eugene Galdi	Director of Transportation and Logistics, Specialty Materials Honeywell International Inc. 101 Columbia Rd., Morristown, NJ 07962	Mar. 23, 2007	9:00 a.m.
Sanjeev Rastogi	Global Marketing Manager, Industrial Products Honeywell International Inc. 101 Columbia Rd., Morristown, NJ 07962	Apr. 9, 2007	9:00 a.m.
Nance Dicianni	President and CEO, Specialty Materials Honeywell International Inc. 101 Columbia Rd., Morristown, NJ 07962	Apr. 10, 2007	9:00 a.m.
Rich Preziotti	Vice President and General Manager, Honeywell Chemicals Honeywell International Inc. 101 Columbia Rd., Morristown, NJ 07962	Apr. 26, 2007	9:00 a.m.

Each deposition shall be taken at the offices of Axinn, Veltrop & Harkrider LLP, 1370 Avenue of the Americas, 19<sup>th</sup> Floor, New York, New York 10019, shall continue until completed, and shall be recorded stenographically before an officer appointed or designated as specified in Rule 28 of the Federal Rules of Civil Procedure.

In accordance with Rule 30(b)(5) of the Federal Rules of Civil Procedure, these deponents are requested to produce at their depositions each document in their possession, custody, or control, including without limitation correspondence, electronic mail, and calendar entries, that refers to, relates to, or reflects:

1. The termination, expiration, renewal, or replacement of the HF Contract between Allied-Signal Inc. and ICI Americas Inc. dated as of November 30, 1989 for the supply of HF (the "1989 Contract").
2. Negotiations for or discussions concerning any HF supply agreement between (a) INEOS and Honeywell or (b) Honeywell and Quimica Fluor.
3. Any "hardship provision" in the Heads of Agreement or a new HF supply agreement between INEOS and Honeywell.

4. Honeywell's increase of the price of HF to be supplied to INEOS in 2006.

5. Any meeting, correspondence, or contract between or among Honeywell, Quimica Fluor, or INEOS that refers to, relates to, or reflects HF.

You are invited to attend and examine each witness.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

February 9, 2007

/s/ Karen L. Pascale

C. Barr Flinn (#4092)

Karen L. Pascale (#2903)

The Brandywine Building

1000 West Street, 17th Floor

Wilmington, DE 19801

(302) 571-6600

*kpascale@ycst.com*

- and -

Richard S. Order [rso@avhlaw.com]

Mark D. Alexander [mda@avhlaw.com]

Aaron C. Brinkman [acb@avhlaw.com]

AXINN, VELTROP & HARKRIDER LLP

90 State House Square

Hartford, CT 06103

(860)275-8100

*Attorneys for Plaintiff INEOS Fluor Americas LLC*

**CERTIFICATE OF SERVICE**

I, Karen L. Pascale, Esquire, hereby certify that on February 9, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Martin P. Tully [mtully@nmat.com]  
Jason A. Cincilla [jcincilla@mnat.com]  
MORRIS, NICHOLS, ARSHT & TUNNELL LLP  
1201 N. Market Street  
P.O. Box 1347  
Wilmington, DE 19899

I further certify that on February 9, 2007, I caused a copy of the foregoing document to be served by hand delivery and e-mail on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

**By E-Mail and First Class U.S. Mail**

Yosef J. Riemer [yriemer@kirkland.com]  
Andrew R. Dunlap [adunlap@kirkland.com]  
KIRKLAND & ELLIS LLP  
153 East 53<sup>rd</sup> Street  
New York, NY 10022

Mark L. Kovner [mkovner@kirkland.com]  
Michael S. Becker [mbecker@kirkland.com]  
KIRKLAND & ELLIS LLP  
655 Fifteenth Street, NW  
Suite 1200  
Washington, DC 20005

/s/ Karen L. Pascale

Karen L. Pascale (#2903)  
YOUNG CONAWAY STARGATT & TAYLOR, LLP  
The Brandywine Building  
1000 West Street, 17th Floor  
Wilmington, DE 19801  
(302) 571-6600  
kpascale@ycst.com  
*Attorneys for Plaintiff INEOS Fluor Americas LLC*